

SEP 05 2017

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

17 CR 094 GKF

All in violation of Title 18, United States Code, Section 875(c).

**COUNT TWO**  
**[18 U.S.C. § 844(e)]**

On or about April 24, 2017, in the Northern District of Oklahoma, the defendant, **JOSE RAWDON TRUJILLO**, through the use of a cellular telephone, an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat to kill, injure, and intimidate individuals employed by the Tulsa County Sheriff's Office, and unlawfully to damage and destroy a building, that is, the Tulsa County Sheriff's Office, Tulsa, Oklahoma, by means of an explosive.

All in violation of Title 18, United States Code, Section 844(e).

**COUNT THREE**  
**[18 U.S.C. § 844(e)]**

On or about May 3, 2017, in the Northern District of Oklahoma, the defendant, **JOSE RAWDON TRUJILLO**, through the use of a cellular telephone, an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat to kill, injure, and intimidate an employee of the United States Marshal Service, and unlawfully to destroy a building, that is, the Federal Courthouse, 333 West Third Street, Tulsa, Oklahoma, by means of an explosive.

All in violation of Title 18, United States Code, Section 844(e).

**COUNT FOUR**  
**[18 U.S.C. § 844(e)]**

On or about June 21, 2017, in the Northern District of Oklahoma, the defendant, **JOSE RAWDON TRUJILLO**, through the use a cellular telephone, an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat to kill, injure and intimidate employees of the Akdar Shrine, and unlawfully to destroy a building, that is, the Akdar Shrine office building, 2808 S. Sheridan Road, Tulsa, Oklahoma, by means of an explosive.

All in violation of Title 18, United States Code, Section 844(e).

**COUNT FIVE**  
**[18 U.S.C. § 875(c)]**

On or about June 21, 2017, in the Northern District of Oklahoma, the defendant, **JOSE RAWDON TRUJILLO**, for the purpose of issuing a threat, knowingly transmitted in interstate commerce a communication to the Akdar Shrine, which contained a threat to injure the persons of others by stating he might cut them from “ear to ear” and “gut” them.

All in violation of Title 18, United States Code, Section 875(c).

**COUNT SIX**  
**[18 U.S.C. § 844(e)]**

On or about June 27, 2017, in the Northern District of Oklahoma, the defendant, **JOSE RAWDON TRUJILLO**, through the use a cellular telephone, an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat to kill, injure, and intimidate employees of the United States Court Clerk's Office, and unlawfully to damage and destroy a building, that is, the United States Federal Courthouse, 333 West Third Street, Tulsa, Oklahoma, by means of fire and explosive, to-wit, "it (the Federal Courthouse) is about to go up in flames."

All in violation of Title 18, United States Code, Section 844(e).

**COUNT SEVEN**  
**[18 U.S.C. § 844(e)]**

On or about July 10, 2017, in the Northern District of Oklahoma,, the defendant, **JOSE RAWDON TRUJILLO**, through the use of a cellular telephone, an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat to kill, injure, and intimidate employees of the Mayes County Sheriff's Office, and unlawfully to destroy a building, that is, the Mayes County Sheriff's Office, Pryor Oklahoma, by means of an explosive.

All in violation of Title 18, United States Code, Section 844(e).

**COUNT EIGHT**  
**[18 U.S.C. § 875(c)]**

On or about August 3, 2017, in the Northern District of Oklahoma, the defendant, **JOSE RAWDON TRUJILLO**, using a cellular telephone, for the purpose of issuing a threat, knowingly transmitted in interstate commerce a communication to the Tulsa County Sheriff's Office which contained threats to injure the persons of others whose identities are known to the Grand Jury, by stating he was going to "kill" a Sheriff Office employee and his or her "parents," because he "knew where they lived."

All in violation of Title 18, United States Code, Section 875(c).



COUNT NINE  
[18 U.S.C. § 844(e)]

On or about August 8, 2017, in the Northern District of Oklahoma, the defendant, **JOSE RAWDON TRUJILLO**, through the use a cellular telephone, an instrument of interstate commerce and in and affecting interstate commerce, willfully made a threat to kill, injure, and intimidate employees of the Tulsa County Sheriff's Office, and unlawfully to destroy a building, that is, the Tulsa County Sheriff's Office, Tulsa, Oklahoma, by means of an explosive, to-wit: placing a "bomb" at the Sheriff's Office.

All in violation of Title 18, United States Code, Section 844(e).

LORETTA F. RADFORD  
ACTING UNITED STATES ATTORNEY

A TRUE BILL

  
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ALLEN J. LITCHFIELD  
Assistant United States Attorney

*/s/ Grand Jury Foreperson*  
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Grand Jury Foreperson